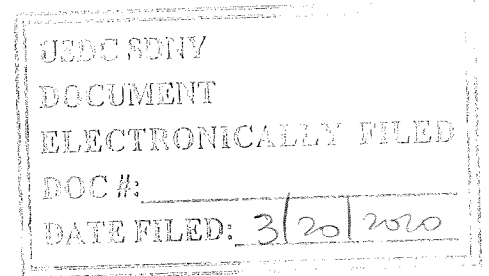


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ATTORNEYS AT LAW

March 20, 2020

Hon. Nelson S. Román  
United States District Judge  
United States Courthouse  
300 Quarropas Street  
White Plains, New York 10601

Re: *United States v. Anthony Lauria*  
Dkt. 19 Cr 449

Dear Judge Román:

I write on behalf of my client Anthony Lauria, as well as Jason Ser, Esq. (counsel for Anthony Molina) and Howard Tanner, Esq. (counsel for Brian Rodriguez), and without objection from the Government, by AUSA Lindsey Keenan, to request that the Court extend the time to file motions, presently due today.

As the Court is aware, the coronavirus pandemic has wreaked havoc with our court system. All three defense counsel are unable to go to their offices per the State of Emergency declarations and today's order from Governor Andrew Cuomo, as well as today's Order of the Court by Chief Judge Colleen McMahon. Trials scheduled have been postponed, court dates have been administratively adjourned, and the legal system has effectively ground to a near-total halt.

After consulting with my colleagues, I request that this Court terminate the previous scheduling order setting the current motion schedule (ECF Dkt. 36). At this point, it is unclear when the State and the Court will sound the "all clear" and the attorneys and the Court can get back to work. Once the criminal justice system is back in order, the Court can set a new schedule for the parties' submissions.

If the Court denies this request, I would then ask (with the consent of my colleagues and without objection by the Government) that the Court extend the deadlines to submit moving papers for another 4 weeks for each deadline under the prior order in hopes that we will be able to get into our offices and complete our submissions (currently March 20, 2020 for defense submissions, April 3, 2020 for Government answers, and April 10, 2020 for replies).

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Presently this matter is scheduled for trial to begin on October 5, 2020, and the request herein will not affect the parties' ability to be ready for trial on that date. Should the restarting of the court system require the resetting of all trial dates, then this delay in the motion schedule will have no collateral effect at all.

I therefore respectfully request that the Court to terminate the pending motion schedule, or if denied, approve the above motion schedule. I thank the Court for its consideration of my request and I hope that the Court and all staff stay healthy and safely distant from danger.

Respectfully submitted,

s/ Sam Braverman  
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Cc: All Parties (BY EMAIL AND ECF)

Defendants' application is granted to the extent that their motions to suppress briefing schedule is extended as follows: moving papers to be filed April 27, 2020; Govt's response papers to be filed May 11, 2020; and replies to be filed May 18, 2020. The parties are directed to provide 2 copies of all documents to chambers as the documents are filed. Clerk of the Court requested to terminate the motion (doc. 39).

Dated: March 20, 2020

SO ORDERED.

  
Nelson S. Román, U.S.D.J.